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VIA ECF

Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street, Room 701
New York, New York 10007

Re: United States v. Michael Shvartsman, et. al., No. 23 Cr. 307 (LJL)

Dear Judge Liman:

On behalf of Michael Shvartsman, a defendant in the above-referenced case, I write to request that the Court modify the travel restrictions imposed on Mr. Shvartsman as a condition of his bail in the manner described below. The Government does not have an objection to this application.

Mr. Shvartsman is the CEO of an investment company and involved in many start-up entities. His work requires frequent travel to the companies with which he is involved and to trade shows and conferences in his industries. This is especially true for meetings locally throughout Florida, where he resides.

Given the above, we respectfully request that Mr. Shvartsman's bail conditions be modified to allow him to travel for business throughout the State of Florida freely, rather than having his travel limited to the Southern District of Florida. This modification would enable him to meet with current business partners and conduct diligence on various companies located broadly in Florida.

In addition, we respectfully request that Mr. Shvartsman be permitted to travel anywhere in the continental United States for business purposes on the condition that he first provide his Pretrial Services Officer and the United States Attorney's Office one week's prior notice of the contemplated travel. Again, this would enable Mr. Shvartsman to travel to trade shows and conferences including those in New York, California, Nevada, Colorado, Illinois and other potential locations. Because these trips are likely to be frequent over the next year, it would be convenient for the attorneys, Pretrial Services, and the Court if Mr. Shvartsman could simply give

a week's notice of the travel and its purpose to the government, without making an application to the Court for each trip.

The government has no objection to this application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tai H. Park'.

Tai H. Park
Counsel for Michael Shvartsman

Cc: All counsel of record